

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROCIO MARTINEZ, MARGARITA VILLALOBOS, ALEJANDRO RAMIREZ, and CHRISTIAN TAPIA,
individually and on behalf of others
similarly situated,

Plaintiffs,

V.

**VALID USA, INC., DANIEL
KHOURI, PARAMESWARI
VELUCHAMY, PETHINAIDU
VELUCHAMY, and TIMOTHY
HOOKS,**

Defendants.

CASE NO. 13-cv-7183

Judge Virginia Kendall

Magistrate Judge Michael Mason

PLAINTIFFS' UNCONTESTED MOTION FOR PRELIMINARY APPROVAL OF A CLASS AND COLLECTIVE ACTION SETTLEMENT; CONDITIONAL CERTIFICATION OF SETTLEMENT CLASSES; DESIGNATION OF CLASS REPRESENTATIVES AND APPOINTMENT OF PLAINTIFFS' COUNSEL; AND APPROVAL OF THE FORM AND MANNER OF CLASS SETTLEMENT NOTICE

Pursuant to Federal Rule of Civil Procedure 23, Plaintiffs ask the Court to enter an order:

1. Preliminarily approving the class-wide Settlement Agreement negotiated by Plaintiffs and Defendant Valid USA, Inc. (“Valid”);
2. Conditionally certifying the proposed subclasses for settlement purposes only;
3. Designating Rocio Martinez, Margarita Villalobos, Alejandro Ramirez, and Christian Tapia as Class Representatives and their attorneys as Class Counsel;
4. Approving the form and manner of class notice; and
5. Setting a date for a final fairness hearing.

6. A draft order is attached to the memorandum of law filed in support of this motion.

WHEREFORE, Plaintiffs request entry of the attached draft order or a similar order.

Respectfully submitted,

/s/ Christopher J. Wilmes

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